

RECEIVED

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DMAP Pro Se: General Complaint

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

United States District Court

Click here to enter text.

Jeffrey Lauren Wright

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

Case No. 4:17-CV-033-DMB-JMV

(To be filled out by Clerk's

Office only)

Jackson Rental Properties Inc.

Department of Community Development

Danita Staples Willie Jackson

COMPLAINT

Jury Demand?

☒ Yes

☐ No

(In the space above enter the full name(s) of the defendant(s).

If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section I. Do not include addresses here.)

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

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I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

Wright Jeffrey L.

Name (Last, First, MI)

819 Shamrock Drive Apt. 11

Street Address

Bolivar Cleveland MS

County, City

State

38732

Zip Code

662-545-4349

Telephone Number

jlw1123@yahoo.com

E-mail Address (if available)

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

Jackson Rental Properties Inc.

Name (Last, First)

140 South Bayou Avenue

Street Address

Bolivar Boyle

County, City

MS

State

38730

Zip Code

Defendant 2:

Department of Community Development

Name (Last, First)

Street Address

Bolivar Cleveland MS

County, City

State

38732

Zip Code

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Defendant(s) Continued

Defendant 3: Staples Danita
 Name (Last, First)
140 South Bayou Avenue
 Street Address
Bolivar Boyle MS 38730
 County, City State Zip Code

Defendant 4: Jackson Willie
 Name (Last, First)
140 South Bayou Avenue
 Street Address
Bolivar Boyle MS 38730
 County, City State Zip Code

II. BASIS FOR JURISDICTION

Check the option that best describes the basis for jurisdiction in your case:

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☐ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☒ **Federal Question:** Claim arises under the Constitution, laws, or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

Civil Rights

III. VENUE

This court can hear cases arising out of [Click here to enter text.](#)

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

All defendants live in this state and at least one of the defendants live in this district.
A substantial part of the events you are suing about happened in this district. A substantial part of the property that you are suing about is located in this district.

IV. STATEMENT OF CLAIM

Place(s) of occurrence: Jackson Rental Properties Inc.

Date(s) of occurrence: January 20, 2017 February 2017 March 2017

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

What happened to you?

The managers of the Jackson Rental Properties Inc. , Danita Staples and Willie Jackson, have posted false signs that lie about the apartment building is unfit and have ordered me to move out of the apartment building were I live and rent. I rent apartment 11 at the apartment building at the address of

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819 Shamrock Drive in Cleveland, Mississippi. The apartment building is owned by Jackson Rental Properties Inc. The notice ordering me to move out of the apartment was posted on my apartment door by Danita Staples on the date of January 20, 2017, and my payment for rent was refused by the manager of the Jackson Rental Properties Inc. for the months of February and March. I have rented and lived in the apartment from November 2014 until March 2017. During the time I lived in the apartment, the managers of the Jackson Rental Properties Inc. and the Department of Community Development conduct inspection of the apartment building once a year, and post of notice ordering all occupants to move out of the apartment building after the inspection of the building has been conducted. Each time inspection has been conducted the same notice stating the building is unfit and occupants are ordered to move out of the building is posted by the managers of the Jackson Rental Properties Inc. and the occupants renting the apartment were forced to leave the apartment building by the Jackson Rental Properties Inc., the Department of Community Development, the Bolivar County Sheriff Department, and the Cleveland Police Department. I was

Was
anyone
else
involved?

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not forced to moved out of the apartment building and I lived in the apartment I rented from the Jackson Rental Properties Inc. and continued living in the apartment each time the notice to move out of the apartment building was posted after inspection was conducted. After inspection was conducted on the date of January 20, 2017 by the managers of the Jackson Rental Properties Inc. and the Department of Community Development the same false notice was posted on the door of the apartment were I live and the managers ordered me to move out of the apartment and refused to accept my payment of rent. My utilities for electric and telephone service are still present at the apartment were I live, and I have not recieved a notice from the electric utilities service or the telephone service that my account will be closed and service turned off because the building will no longer recieve utilities service because the building is unfit and occupancy of the building is ordered to move out of an evicted building. The U.S. Postal Service did not remove my apartment mail box rental which was paid to receive mail at the apartment through the U.S. Postal Service in Cleveland, Mississippi. In March 2017, the managers of the Jackson Rental Properties Inc. turned off the water

Was
anyone
else
involved?

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Who did
what?

Danita Staples and Willie Jackson, the managers of the Jackson Rental Properties Inc. posted false signs ordering me to move out of the apartment I live in, refused to accept payment of rent for the months of February and March, and turn off the water supply to the apartment building in March 2017. The Department of Community Development of the city of Cleveland, Mississippi conducted inspection and participated in ordering the notice posted by the Jackson Rental Properties Inc. ordering me to move out of the apartment and ~~falsely~~ issuing a false notice of unfit building and order to leave the building.

V. INJURIES

If you sustained injuries related to the events alleged above, describe them here.

I was forced to hold myself from using the bathroom toilet and ~~continues~~ to hold myself without release because the water supply was turned off at the apartment building. I was forced to live in the apartment with ~~filled and use~~ and used toilets that would not flush and are filled with waste.

VI. RELIEF

The relief I want the court to order is:

- ☐ Money damages in the amount of: \$ _____
- ☒ Other (explain):

I want the court to order Jackson Rental Properties Inc. to accept payment for the rent and to continue with the rental agreement that I have with the Jackson Rental Properties Inc.. I want the court to order the Jackson Rental Properties that I am not removed for the apartment I rent and that I am not to be removed for the apartment I rent also. I want the court to order the Jackson Rental Properties to turn on to water supply to the building were I live. I want the court to give the court order issued to the Jackson Rental Properties to the Department of Community Development.

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VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

March 13, 2017
Dated

Jeffrey L. Wright
Plaintiff's Signature

Wright Jeffrey L.
Printed Name (Last, First, MI)

819 Shamrock Drive Apt. 11 Cleveland MS 38732
Address City State Zip Code

662-545-4349
Telephone Number

jlw1123@yahoo.com
E-mail Address (if available)

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.

United States District Court for the Northern
District of Mississippi
File Number _____

Jeffrey Lauren Wright,
Plaintiff

Notice of Appeal

v.

Jackson Rental Properties
Inc. and Department of
Community Development,
Defendants

Notice is hereby given that Jeffrey Lauren Wright, plaintiff Jackson Rental Properties Inc. and Department of Community Development, defendants in the above named case,* hereby appeal to the United States District Court for the Northern District of Mississippi for an appeal for civil action against the Jackson Rental Properties Inc. and the Department of Community Development decision to order of vacate the premises of the building located at 819 Shamrock Drive, Cleveland, MS 38732 and all tenants are ordered to leave the building by order of property is unfit for human occupancy posted and ordered by the Jackson Rental Properties Inc. and the Department of Community Development entered in this action on the 3rd day of March, 2017.



State of: Mississippi
County of: BOLIVAR
The foregoing document was acknowledged before me
this 3rd day of March, in the year 2017
Jeffrey Wright
Jeffrey Wright, Notary Public
My Commission Expires July 10, 2020

(s) Jeffrey Lauren Wright
Jeffrey Lauren Wright
Address: 819 Shamrock Dr. Apt. 11
Cleveland, MS 38732
Telephone Number: (662)545-4349
E-mail Address: jw1123@yahoo.com

[Note to inmate filers: If you are an inmate confined in an institution and you seek the timing benefit of Fed. R. App. P. 4(c)(1), complete Form 7 (Declaration of Inmate Filing) and file that declaration along with this Notice of Appeal.]

* See Rule 3(c) for permissible ways of identifying appellants.

Jackson Rental Properties Inc.
140 South Bayou Avenue
P. O. Box 90 Bayou, MS 38730
Phone: (662) 840-0002
Fax: (662) 840-0444

LEASE AGREEMENT

TENANT: Jeffery Wright CO-TENANT: _____
PROPERTY ADDRESS: 819 Shamrock Apt #11
Cleveland, MS 38732
PHONE: (662) 302-4344 CELLULAR: 662-627-2858
ALL OTHER NUMBERS OF THE PREMISES: _____

NAME AND ADDRESS OF NEAREST RELATIVE: Jacqueline Wright (Mom)
(Jackie)

PHONE: (662) 627-2858 CELLULAR: _____
TENANT'S EMPLOYER: SSI

ADDRESS: _____ PHONE: _____

CO-TENANT'S EMPLOYER: N/A

ADDRESS: _____ PHONE: _____

NAME AND ADDRESS OF FORMER LANDLORD

1. 470 Old River Rd. Clarksdale, MS 38614 (Stovall Farms)
2. _____

**I
RENT & DEPOSIT:**

Tenant(s) shall pay a \$200 security deposit upon execution of this agreement which is **Non-Refundable** at any time before, during or after the tenancy began. Rent is \$ 415 per month for the said property which shall be paid on the 1st day of the month the property is rented.

**II
TERMS:**

This lease is in effect for one year. During the term of this lease, the landlord had the right and the tenant agree to any increase in the rent and the landlord will give proper notice 3-day in advance of the increase. The tenant may re-new this lease at the discretion of the landlord. Anytime after the first tenancy has been completed, if the tenant does not wish to continue residing at the premises, a 30-day in advance notice must be submitted to the office upon the upcoming expiration of the lease agreement.

**III
UTILITIES**

Tenant shall be responsible for the payment of his/her own utilities. That is electricity, gas, telephone, cable, etc.

**IV
LATE FEES**

If the rent remains due by the 6th day of the month in which rent is initially due, the landlord will charge, and the tenant agrees to pay, a late fee in the amount of \$25.00. If the rent is still not paid by the 10th day of the month, the tenant will be turned over to justice court for collection and/or eviction. They may also be subjected to garnishment.

**V
TERMINATION FOR NONPAYMENT**

Failure to pay the rent when due entitles the landlord to terminate tenancy and the landlord shall have the right to take the lawful steps as may be deemed proper to collect the money due and to take immediate possession of the property.

**VI
SUBLETTING PROVISIONS**

Tenant shall not sublet said apartment or any part thereof. Only the names which appear on the lease will be permitted to live in the apartment. If it is found that there are person(s) living in the apartment whose name is not on the lease agreement; that tenant will be subject to eviction for violation of their lease.



Entergy

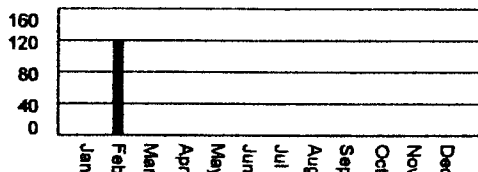
Entergy Mississippi, Inc.
entergy-mississippi.com

Case: 4:17-cv-00033-DMB-JMV Doc #: 1 Filed: 03/15/17 Page 13 of 13
Service Location: 814 North St Apt 13
Cleveland, MS 38732-2720
Customer Service: 800-368-3749 (800-ENTERGY)
Residential: 7a-7p; Business: 8a-5p; Mon-Fri
Power Outage or Safety Concern, 24 hrs/7days
800-968-8243 (800-9OUTAGE)

Internet

Total Monthly Energy Usage

| Billing Period | Billing Days | kWh Used | Avg kWh Per Day | 2017 |
|----------------|--------------|----------|-----------------|------|
| Feb 2017 | 7 | 118 | 16.9 | 2016 |



Important Messages

This is your final bill.

All open line items will be transferred to your new Account Number 144434727.

Real-Time Payment Options:

- My Account Online at entergy.com
- By Phone at 800-584-1241 for a small fee.

Please add \$1 to total bill amount for The Power to Care. Learn more at entergy.com.

Account Summary for Jeffery Lauren Wright

| | | |
|--------------------------------|------------|-----------|
| Account # XXXX 5144 | Mail Date | QPC 09000 |
| Invoice # 2016058321 | 02/27/2017 | Cycle 05 |
| Amount to be transferred | | \$142.43 |

Account Detail

| | |
|---------------------------------|----------------|
| Transfer From Account 119139129 | 76.88 |
| Remaining Balance | \$76.88 |

Current Charges

| | |
|--|-----------------------------|
| Energy Charge | 21.77 |
| Fuel Adjustment | 118 kWh @ \$-0.010305 -1.22 |
| Total Metered Charges (Contract 16378992) | \$20.55 |
| Connect Fee | 45.00 |
| Total Amount Due | \$142.43 |

(Residential bills are exempt from sales tax.)

Meter Reading (Contract 16378992)

| | |
|------------------------|----------------------|
| Meter # 5042087 | Rate : MS_RS |
| Total Days (7) | |
| Current Meter Reading | (02/22/2017) 44023 |
| Previous Meter Reading | (02/16/2017) - 43905 |
| kWh Metered | 118 |



Entergy

entergy-mississippi.com

Account ~~XXXX~~ 5144

QPC 09000

Invoice 2016058321

| | | |
|---|--------------------------|----------|
| Customer Service 800-ENTERGY (800-368-3749) | Amount to be transferred | \$142.43 |
|---|--------------------------|----------|

Balance to be transferred to new account.
Please send stub with check payable to Entergy. Thank You.

Internet

000005820 01 AV 0.370 ***** AUTO**SCH 5-DIGIT 38720



JEFFERY LAUREN WRIGHT
819 SHAMROCK DR APT 11
CLEVELAND MS 38732-3410

ENTERGY
PO BOX 8105
BATON ROUGE, LA 70891-8105

9000000144295144000000000000000014243000000000000007901

AM R MSRS E2 L07

000005820 05820 00001 enths_BIL_DP0_MAIL_01.20170225_020417

TRY PAPERLESS BILLING!

SAVE TIME. SAVE MONEY. SAVE TREES.

- No more checks, stamps or envelopes
- Make payments online quickly and conveniently
- View the past 24 months of statements online
- Manage your account and so much more!

It's so easy! Sign up at
www.cableone.net/paperless today!

CABLE ONE

It's just Common Sense



▼ PLEASE TEAR ALONG PERFORATION AND INCLUDE WITH PAYMENT ▼

CABLE ONE

PO BOX 1200
CLEVELAND MS 38732-1200

6175 0000 NO RP 23 12232016 NNNNNNNN 01 037940 0152

JEFFREY WRIGHT
819 SHAMROCK DR APT 11
CLEVELAND MS 38732-3410

CABLE ONE

| | Mon | Tue | Wed-Fri | Sat,Sun |
|-----------------|-----------------|-----|---------|---------|
| Walk In Lobby | Closed | 9-5 | 8-5 | Closed |
| Billing & Sales | 8-5 | 8-5 | 8-5 | Closed |
| Tech Support | 24 hours/7 days | | | |

(662) 843-4016

cableone.net

BILLING SUMMARY

Account # ~~XXXX~~ 2724

JEFFREY WRIGHT
819 SHAMROCK DR APT 11
CLEVELAND MS 38732-3423

| | |
|---------------------------|---------|
| Previous Balance | 33.88 |
| Payment Received 12/06/16 | 33.88CR |
| Monthly Services | 27.95 |
| Taxes & Fees | 5.93 |

Total Due \$33.88

DATE DUE 01/06/17

For services provided from 12/23/2016 to 1/22/2017

**** Please do not make a payment ****
Your balance due will be
drafted from your bank account.
* Thank you for using Cable One Easy
Pay! *

Payments not received by the 30th day of the billing
cycle are subject to late fees.

PAYMENT COUPON

Need assistance? Check online:
<http://support.cableone.net>

Account # ~~XXXX~~ 2724

Balance Due \$33.88

Date Due 01/06/17

Amount Paid \$ _____

▼ MAIL PAYMENTS TO: ▼

CABLE ONE
PO BOX 9001009
LOUISVILLE, KY 40290-1009



384 119582724 00000033886 1



CONFIRMATION LETTER

VERIFICATION REQUIRED

Mail will be forwarded for the following individual only:

**JEFFREY L
WRIGHT**

Your mail will be forwarded to your **NEW** address, as you requested, on: **Dec 2, 2014**

YOUR OLD ADDRESS

**JEFFREY L WRIGHT
PO BOX 2002
CLARKSDALE MS 38614-8002**

YOUR NEW ADDRESS

000001644 02 AB 0.406 T:0011

**JEFFREY L WRIGHT
819 SHAMROCK DR # 11
CLEVELAND MS 38732-3423**

If the information contained on this page is incorrect, or you have not received mail at your new address for **10 Postal business days or more**, please call **1-800-ASK-USPS** (1-800-275-8777).

If you need to view or cancel this Change-of-Address Order or change the date to start forwarding your mail, visit managemymove.usps.com and enter the Confirmation Code: **1433 6206 6000 3260**

Visit managemymove.usps.com to add your email address and receive email reminders of mail forwarding expiration dates.

MAIL FORWARDING EXPIRATION DATES

| | |
|--|----------------------------|
| First Class Mail, Priority & Express.... | Dec 2, 2015 |
| Newspapers, Magazines..... | Jan 31, 2015 |
| Packages ¹ | Dec 2, 2015 |
| Catalogs | Not Forwarded ² |
| Standard Mail | Not Forwarded ² |

¹ Some restrictions apply. ² Delivery requested by addressee.

NOTIFY CORRESPONDENTS WHO SEND YOU MAIL

Mail forwarding may be available for up to 12 months and covers only certain classes of mail.

To ensure delivery of all your mail and to avoid forwarding delays, you should notify everyone who sends you mail.

IMPORTANT MESSAGES FROM THE U.S. POSTAL SERVICE REGARDING YOUR MAIL FORWARDING REQUEST:

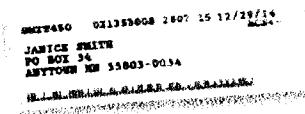
Yellow stickers with your new address are placed on mail forwarded by the U.S. Postal Service. To receive your mail faster, notify the sender of your new address.

Please retain this Official Change of Address Confirmation page for your records as local agencies and/or resources may require it for proof of your move.

WHY THE YELLOW LABELS?

Yellow labels indicate the correspondent doesn't know your new address.

If you receive mail with a yellow label attached, notify the sender of your new address.



▼ LOOK INSIDE: STORE LOCATOR & VALUABLE OFFERS ▼

CITY OF CLEVELAND, MISSISSIPPI
Department of Community Development

**THIS DWELLING IS UNFIT FOR
HUMAN OCCUPANCY**

**OCCUPANTS OF THIS DWELLING ARE HEREBY
ORDERED TO VACATE THE PREMISES
IMMEDIATELY OF THIS NOTICE**

This property is in direct violation of the 2015 Property Maintenance Code for the City of Cleveland, Mississippi. Any person who defaces or removes this placard without the approval of the Code Official shall be subject to fines and/or imprisonment.

Code Reference: Section 108.1.3 Structure Unfit for Human Occupancy

Location of Violation: 819 Shamrock Drive Apt. # 11

Owner: Jackson Rental Properties Inc. Parcel#: 33-21-640-00-00800

Address: P O Box 90 Legal: Lots 8 & 9 Shamrock Subdivision

City, State, Zip: Boyle, MS 38730 Date Posted: January 20, 2017

Posted By: Danita Staples

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL

PRIORITY MAIL
POSTAGE REQUIRED



Retail

PF



P

US POSTAGE PAID
\$6.65



Origin: 38732
Destination: 38655
0 Lb 15.10 Oz
Mar 13, 17
2715340732-06

1006



PRIORITY MAIL® 2-Day



Expected Delivery Day: 03/15/2017

C008

USPS TRACKING NUMBER



9505 5142 4083 7072 0606 46

WHEN
A
LA

FROM:

**PRIORITY®
★ MAIL ★**



VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE

FROM: Jeffrey Lauren Wright
819 Shamrock Dr. Apt. 11
Cleveland, MS 38732

TO:

United States District Court
Northern District of Mississippi
Office of the Clerk
911 Jackson Avenue, Room 369
Oxford, Mississippi 38655

369

Label 228, March 2016

FOR DOMESTIC AND INTERNATIONAL USE



EP14F July 2013

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